

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Missouri

In the Matter of the Search of )  
 the Priority Mail Express parcel bearing tracking number )  
**9470 1112 0620 3345 2577 16** addressed to: "Robert ) Case No. 4:23 MJ 9026 RHH  
 Jennings, 3906 Ashland Ave Saint Louis MO 63107-2008" )  
 with a return address of "Silverlake, 421 E La Habra Blvd ) SUBMITTED TO THE COURT AND  
 La Habra CA 90631-5524." ) SIGNED BY RELIABLE ELECTRONIC MEANS

## APPLICATION FOR A SEARCH WARRANT

I, Joseph Woodland, a federal law enforcement officer or an attorney for the government request  
 a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

the Priority Mail Express parcel bearing tracking number **9470 1112 0620 3345 2577 16** addressed to: "Robert  
 Jennings, 3906 Ashland Ave Saint Louis MO 63107-2008" with a return address of "Silverlake, 421 E La  
 Habra Blvd La Habra CA 90631-5524."

located in the EASTERN District of MISSOURI, there is now concealed

controlled substances and/or United States currency.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

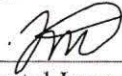
<i>Code Section</i>	<i>Offense Description</i>
Title 21, U.S.C., §§ 846, 841(a)(1)	possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested  
 under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

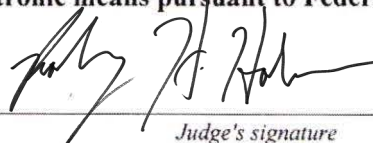
**I state under the penalty of perjury that the foregoing is true and correct.**

  
 Joseph Woodland, Postal Inspector  
 United States Postal Inspection Service

*Printed name and title*

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of  
 Criminal Procedure 4.1 and 41.

Date: April 5, 2023

  
 Judge's signature

City and State: St. Louis, MO

Rodney H. Holmes, U.S. Magistrate Judge

*Printed name and title*

AUSA: JOHN MANTOVANI

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Joseph M. Woodland, being duly sworn by reliable electronic means, state the following:

**I. Introduction**

1. I am a U.S. Postal Inspector assigned to the United States Postal Inspection Service (USPIS) St. Louis, MO narcotics team and I am deputized as a Task Force Agent with the Drug Enforcement Administration (DEA). My investigative focus is to dismantle drug trafficking organizations through investigations involving federal criminal violations related to illicit narcotics, narcotics sales, and the laundering of narcotics proceeds. Throughout my law enforcement career, I have received advanced training in multiple aspects of criminal investigations, including the identification and investigation of controlled substances, and I have authored numerous affidavits in support of criminal complaints and search warrants as it relates to state and federal criminal offenses. Prior to my time as a federal agent, I attended the St. Louis County Police Academy in 2009 and was a commissioned police officer in Missouri until 2020. During my tenure, I held assignments as a Patrolman, Detective, and Patrol Sergeant and was tasked with investigating and supervising police officers who investigated drug violations, crimes against property and crimes against persons. I held a generalist law enforcement instructor license through the Missouri Department of Public Safety and am currently an Officer Survival and Defensive Tactics Instructor with the USPIS.

**II. Experience of the Investigative Team**

2. Experience and drug trafficking intelligence information gathered by the USPIS has demonstrated that the U.S. Postal Service (USPS) Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping illicit drugs and/or proceeds/payments derived from illicit drug trafficking. Use of Express Mail and Priority Mail are favored because of the

speed (Express Mail - overnight; Priority mail - two-day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business, correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping illicit drugs or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express (FedEx) and United Parcel Service (UPS) are similar to USPS Express Mail and Priority Mail. Like USPS Express Mail and Priority Mail, FedEx and UPS are favored because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Like USPS Express Mail and Priority Mail, FedEx and UPS were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages which were found to contain illicit drugs or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. FedEx and UPS are seldom utilized to convey individual-to-individual correspondence.

4. I am also aware from previous investigative experience and training that those engaged in the movement of illicit drugs through U.S. mail or other parcel carrying and delivery services such as FedEx or UPS often use a network of available delivery "drop" addresses to vary delivery or sending locations and frequency in an attempt to avoid law enforcement attention. These "drop" addresses may include true residences of co-conspirators, associates, or relatives. Shipments of illicit drugs are often broken up into multiple parcels destined for the same or multiple addresses in further efforts to avoid detection. Though the sender information may be



fictitious, illicit drugs proceeds parcels are often addressed to a true person and/or true address to ensure the receipt and security of bulk cash or monetary instrument mailings.

5. To combat the flow of illicit drugs or illicit drug proceeds through the overnight and/or two to three-day delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of, and destinations for, illicit drugs or illicit drug proceeds. The USPIS conducted an analysis of prior packages mailed through overnight and/or two to three-day delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are usually from an individual to an individual. In the few cases when overnight, and or two-to-three-day delivery service packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business listed is not associated with the mailer and was randomly selected by the mailer to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.

6. Most business mailings sent via USPS or through other private couriers reflect a pre-established postage meter or other various lines of credit to pay for the postage. Additionally, during the Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via the internet) the USPIS learned that unknown persons posted intelligence on the Silk Road website warning would be drug mailers that most USPIS search warrant affidavits for illicit drug proceeds packages, reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and or valid

business names on narcotics/narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics/narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain illicit drugs or the proceeds of illicit drug trafficking. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include USPS Express Mail, USPS Priority Mail, FedEx, and UPS. This profile includes the following characteristics: package mailed from or addressed to an illicit drug source city; package has a fictitious or misused return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and or any other characteristic previously noted in this paragraph

7. The U.S. Postal Inspection Service St. Louis Field CI2 Team has found the characteristics listed in paragraphs three, four, five, and six are indicative of packages which have been found to contain illicit drugs or the proceeds/payments for the trafficking of illicit drugs.

### **III. Purpose of Affidavit**

8. This affidavit is submitted for the limited purpose of establishing probable cause for the search warrant sought. I have not set forth every fact known to me concerning this investigation. I have included what I believe are facts sufficient to establish probable cause that

violations of Title 21, United States Code, Sections 841 (a)(1), 846, 843(b), and Title 18, United States Code, Sections 1956, and 1957, have occurred, are occurring, and will occur. The information contained in this affidavit is based upon my personal knowledge and investigation, as well as information conveyed to me by other law enforcement agents and employees.

#### **IV. Identification of Subject Package**

9. On April 4, 2023, I identified **USPS PME 9470 1112 0620 3345 2577 16** (hereinafter referred to as the “**Subject Package**”), a one-day Express service package destined to 3906 Ashland Ave., St. Louis, MO 63107 from the La Habra, CA Post Office (90631). The **Subject Package** was a 3 lbs. package with \$48.60 postage paid from a pre-paid unknown third-party shipping/postage account.

10. On the morning of April 5, 2023, the **Subject Package** was located at the USPS Network Distribution Center (NDC) in Hazelwood, MO. Further inspection revealed the **Subject Package** was a heavily taped white cardboard box, with a computer-generated adhesive PME 1-day label addressed from “Silverlake” at “421 E La Habra Blvd La Habra CA 90631-5524” to “Robert Jennings” at “3906 Ashland Ave Saint Louis MO 63107-2008”. The signature requirement was waived on the label. Due to the characteristics of the **Subject Package**, I detained the **Subject Package** for further review to verify the validity of the addressee and sender listed on the mailing label and further inspect the parcel.

11. The **Subject Package** measured twenty-four inches by sixteen inches by nineteen inches (12” x 9” x 4”). A search of open-source databases and other law enforcement databases revealed no associations between the sender and recipient names/addresses. USPS business records revealed the package was mailed on April 4, 2023. Due to the overall characteristics of the **Subject Package** (high postage payment with no signature requirement and fictitious



sender/recipient name, person-to-person mailing, the size/weight, heavily taped, etc.), the **Subject Package** was removed from the NDC for canine inspection.

#### **VI. Canine Alert to the Subject Package**

12. The **Subject Package** was brought to the USPIS St. Louis Field Office. USPIS TFO Mason McNail who is a canine handler, to present the **Subject Package** to canine Tobi. The **Subject Package** as well as decoy packages were placed in an area of a secure room at the field office not previously known to be contaminated with the presence of any illicit drug odors. Upon arriving to the **Subject Package**, TFO McNail said that Tobi alerted to the **Subject Package**, indicating the presence of an odor of an illicit drug that Tobi is trained to detect. TFO McNail said Tobi did not alert to any other packages. TFO McNail provided a copy of canine Noco's qualification information dated November 14, 2022, which is attached to this affidavit.

#### **VII. Conclusion**

13. Based on my training and investigative experience, as well as the training and investigative experience of other members of the USPIS Narcotics Team, I know that the size and weight of the **Subject Package**, coupled with other indicators (high postage payment with no signature requirement, fictitious sender/recipient name, person-to-person mailing, the size/weight, heavily taped, and positive reaction by an illicit drug trained canine), are indicative of other packages which have been found in the past to contain illegal narcotics, monies, or monetary instruments which are the proceeds/payments of drug trafficking.

14. Given the facts and circumstances above, it is my belief the **Subject Package** will contain narcotics, a violation of one or more of the United States Code sections listed above. Upon execution of the search warrant, I will provide the court with documentation of my findings.

15. The **Subject Package** is currently in the custody of U.S. Postal Inspector Joseph Woodland in the Eastern District of Missouri. Attached herewith is a picture of the mailing label for the Subject Package and a copy of the qualifications for canine Tobie.

**VIII. Request for Sealing**

16. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.

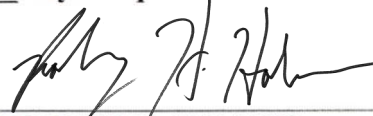
**I state under penalty of perjury that the foregoing is true and correct.**



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Joseph M. Woodland  
U.S. Postal Inspector

**Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 5th day of April 2023.**



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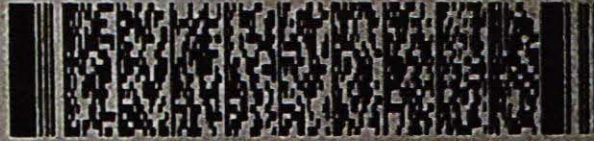
RODNEY H. HOLMES  
United States Magistrate Judge  
Eastern District of Missouri



**E**

US POSTAGE & FEES PAID  
3 LB PRIORITY MAIL EXPRESS RATE  
ZONE 7  
ComBasPrice

06290001443296  
19038236  
FROM 90631



stamps  
and  
04/04/2023

**PRIORITY MAIL EXPRESS 1-DAY™**

Silverlake  
421 E La Habra Blvd  
La Habra CA 90631-5524

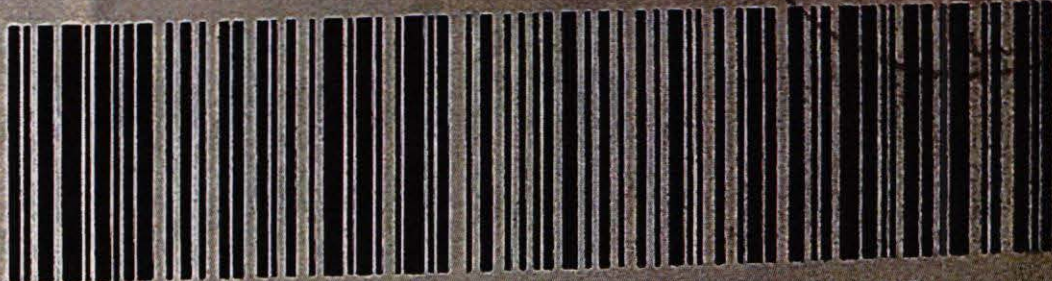
**0007**  
(000) 000-0000

WAIVER OF SIGNATURE

**SHIP  
TO:**

Robert Jennings  
3906 Ashland Ave  
Saint Louis MO 63107-2008

**USPS TRACKING #**



**9470 1112 0620 3345 2577 16**



**North County Police Cooperative**  
Bureau of Criminal Investigations Canine Detective  
Canine Probable Cause Affidavit of Qualifications  
Handler: Detective Mason McNail, DSN 373  
Canine "Tobi"

I, Detective Mason McNail, DSN 373, have been a Commissioned Police Officer with the North County Police Cooperative since January of 2021. I have previously amassed 23 years of police and narcotics experience while employed by the Lincoln County Sheriff's Office, Richmond Heights Police Department, and the St. Ann Police Department. I was also assigned to the Drug Enforcement Administration as a Task Force Officer from 2013 to 2017. I have completed 960 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Tobi" and I are currently assigned to the North County Police Cooperative Bureau of Criminal Investigations, as well as the United States Postal Inspection Service.

Canine Tobi is a brindle colored, male, Dutch Shepherd. He was born on June 10, 2018. Canine Tobi and I attended and completed the "Narcotics Detection" training course from August 2, 2020 through August 14, 2020. This course was held at F.M. K9, located in Berrien Center, Michigan. The training course consisted of two weeks of instruction in the application of canine obedience, narcotics/controlled substance detection, and article search. Canine Tobi and I were certified by the International Police Work Dog Association (IPWDA) as an accredited Narcotic Detection Canine team on May 2, 2022.

Canine Tobi has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, Fentanyl, MDMA, and Marijuana. Canine Tobi alerts to these odors in a passive manner and exhibits a significant change in behavior by sitting, standing, or laying at, or as close as he can get to, the source of the odor.

Since Canine Tobi and I began working, he has been responsible for the seizure of approximately 466.3 pounds of marijuana, approximately 162.9 pounds of methamphetamine, 55.1 pounds of fentanyl, 14.7 pounds of cocaine, approximately 2.8 grams of LSD, 4.91 pounds of Psilocybin, 10 pounds of Promethazine, 5.6 pounds of Ecstasy, 16 grams of Heroin, 606.9 grams of Xanax, and 13 firearms. Canine Tobi has also been responsible for the seizure of approximately \$1,147,023 in smuggled bulk US Currency and Money Orders.

Canine Tobi and I train a minimum of 16 hours per month, in the areas of narcotic detection, obedience, tracking, and article searches with the Maryland Heights Police Department, St. Charles Police Department, certified trainers, other canine programs, and/or on our own time.

This affidavit is current as of November 14, 2022.

Detective Mason McNail, DSN 373  
North County Police Cooperative  
Bureau of Criminal Investigations  
8027 Page  
St. Louis, MO  
314-427-8000